

*Sioux Steel Company v.
KC Engineering, P.C.*

Chad Kramer, PE
September 29, 2016



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<p>Page 5</p> <p>1 A Understood.</p> <p>2 Q And if you need to take a break at any time, just let</p> <p>3 me know as well.</p> <p>4 A Okay.</p> <p>5 Q Oftentimes witnesses are sitting there hoping that the</p> <p>6 court reporter or one of the lawyers says, "Let's take</p> <p>7 a break." But don't wait. If you need a break, just</p> <p>8 let me know.</p> <p>9 A All right.</p> <p>10 Q Could you state your address for the record, please.</p> <p>11 A 5209 South Culbert Avenue, Sioux Falls, South Dakota.</p> <p>12 Q And it's my understanding that you are currently</p> <p>13 employed at Sioux Steel?</p> <p>14 A Yes.</p> <p>15 Q And for how long have you been at Sioux Steel?</p> <p>16 A It will be nine years in October.</p> <p>17 Q And you are a professional engineer?</p> <p>18 A Yes.</p> <p>19 Q For how long have you been a professional engineer?</p> <p>20 A Since 2004.</p> <p>21 Q Where did you grow up?</p> <p>22 A I grew up in northeast Nebraska.</p> <p>23 Q Where did you go to college at?</p> <p>24 A I attended the South Dakota School of Mines.</p> <p>25 Q Did you go on to any further schooling after you got</p>	<p>1 Q Did you come to Sioux Steel once you left Littleton?</p> <p>2 A Yes.</p> <p>3 Q What was the reason for leaving Littleton to come to</p> <p>4 Sioux Steel?</p> <p>5 A I grew up in northeast Nebraska, so we wanted to get</p> <p>6 back closer to family.</p> <p>7 Q So you would have left Littleton by your choice?</p> <p>8 A Yes.</p> <p>9 Q Has your license ever been disciplined in any way by</p> <p>10 any state or jurisdiction?</p> <p>11 A No.</p> <p>12 Q Then obviously it's never been revoked in any</p> <p>13 jurisdiction.</p> <p>14 A No.</p> <p>15 Q Has your role at Sioux Steel been the same over the</p> <p>16 nine years you've been there?</p> <p>17 A No.</p> <p>18 Q When you began, what were you doing?</p> <p>19 A I was a structural engineer when I first started there.</p> <p>20 Q And then how would it -- just explain to me how it</p> <p>21 would have changed or morphed or transformed over those</p> <p>22 nine years.</p> <p>23 A I've done structural engineering in some capacity</p> <p>24 during those nine years but took sort of a management</p> <p>25 role. I was an engineering supervisor beginning about</p>
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<p>Page 6</p> <p>1 your degree from Mines?</p> <p>2 A I did not. I obtained my bachelor's, and that was it.</p> <p>3 Q You're currently licensed as an engineer in the state</p> <p>4 of South Dakota?</p> <p>5 A Yes.</p> <p>6 Q Are you licensed in any other states?</p> <p>7 A Yes.</p> <p>8 Q What other states?</p> <p>9 A Colorado, Nebraska, Minnesota, and Iowa.</p> <p>10 Q Do you have any further licensing or designation for</p> <p>11 structural engineering? mechanical engineering?</p> <p>12 A No.</p> <p>13 Q Following your graduation from Mines, where did you go</p> <p>14 work at?</p> <p>15 A I worked for a consulting firm, AKM Engineering in</p> <p>16 Littleton, Colorado.</p> <p>17 Q For about how long were you there?</p> <p>18 A Almost 10 years.</p> <p>19 Q What sort of work did that engineering firm in</p> <p>20 Littleton, Colorado, do?</p> <p>21 A Structural consulting. So we did structural design for</p> <p>22 light commercial and residential.</p> <p>23 Q Was there an ag component to that with grain bins or</p> <p>24 hoppers or not?</p> <p>25 A There was not.</p>	<p>1 four years ago and then have been engineering manager</p> <p>2 since a little over a year ago.</p> <p>3 Q Today are there other licensed engineers at</p> <p>4 Sioux Steel?</p> <p>5 A Yes.</p> <p>6 Q How many?</p> <p>7 A One.</p> <p>8 Q What's his or her name?</p> <p>9 A Curtis Smith.</p> <p>10 Q And how long has Curtis been with Sioux Steel?</p> <p>11 A Since February of 2016.</p> <p>12 Q Prior to Curtis have there been any other licensed</p> <p>13 engineers?</p> <p>14 A Yes.</p> <p>15 Q How many?</p> <p>16 A One.</p> <p>17 Q What is his or her name?</p> <p>18 A Lucas Lorenzen.</p> <p>19 Q From when to when was Lucas working there?</p> <p>20 A He was there before I started, and he left last</p> <p>21 September.</p> <p>22 Q So at some point in your tenure you were senior from a</p> <p>23 management perspective to Lucas?</p> <p>24 A Yes.</p> <p>25 Q And then you're currently the manager to --</p>